



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

2.101

April 25, 2002

Reply To
Attn Of: ECL-115

VIA FACSIMILE AND FIRST CLASS MAIL

Mr. Robert Wyatt
Environmental Compliance Specialist
Northwest Natural & Co-Chairman, Lower Willamette Group
220 Northwest Second Avenue
Portland, Oregon 97209

Mr. Trey Harbert
Environmental Program Manager
Port of Portland & Co-Chairman, Lower Willamette Group
P.O. Box 3529
Portland, Oregon 97208

Extension of Time for Submittal of Certain AOC Deliverables

This letter responds to your letter received by EPA on April 12, 2002, requesting an extension of time for certain deliverables.

EPA approves an extension of time to **June 7, 2002**, for the deliverables contained in the following paragraphs in Section VII (Work To Be Performed):

- Paragraph 4.B.ii.c. (Conceptual Site Model)
- Paragraph 4.B.i.d. (Data gaps and compilation)
- Paragraph 4.B.ii.h. (Project Management Plan and Data Management Plan)

EPA approves an extension of time to **June 14, 2002**, for the deliverables contained in the following paragraphs in Section VII (Work to Be Performed):

- Paragraph 4.B.ii.d. (Candidate Early Action Areas)
- Paragraph 4.B.ii.e. (Preliminary RAO's)
- Paragraph 4.B.ii.e. (Natural Attenuation)
- Paragraph 4.B.ii.f. (Draft RI/FS Work Plan for the Initial Study Area) Please note that the extension of time granted for the Draft RI/FS Work Plan for the ISA does not apply to any specific deliverable or subdeliverable which is part of the Work Plan and the deadline for which has not been specifically extended.



- Paragraph 4.B.ii.g. (Sampling and Analysis Plan and Quality Assurance Project Plan)
- Paragraph 4.B.ii.h. (Health and Safety Plan)

Requirement to Submit Information in Support of Project Workgroups

EPA is encouraged by reports from EPA workgroup participants that workgroups are an enlightened means of exchange which could provide cost and time-saving efficiencies. If Respondents' participants were more freely able to exchange written materials, EPA participants could work from those written materials and study ideas as they iterate. Currently, EPA participants are forced to rely solely on what they can remember and have to react to materials while they are initially trying to absorb them. From a project management perspective, EPA considers this counter-productive and critically important to restructure for workgroups to function in the future.

In exchange for the extension of time, EPA is hereby requiring Respondents to summarize the following information relating to sediment, biota, and aqueous media (including ground water, pore water, and surface water) in table format and submit to EPA no later than **Thursday, May 9, 2002**:

1. Sample types, approximate number and location of samples, and rationale for their selection.
2. Chemical classes to be analyzed for each media.

These summaries should enable EPA and Respondents to have a substantially more valuable exchange in meeting presentations scheduled for May 15, and thereafter. In addition, it is important to understand that by granting the schedule extensions described above, the time for EPA review of documents prior to the upcoming sampling season, and the time for Respondents to incorporate any changes required by EPA will be truncated. If Respondents submit a Work Plan requiring substantial modification, the shortened time frame could result in inadequate time for EPA to provide comments and for Respondents to incorporate them in a timely fashion. The table information described above will provide a basis for EPA to determine whether EPA and Respondents share a common view of the sampling effort needed for sediments, biota, and aqueous media. If the table information indicates vastly different approaches, EPA may develop its own version of the Work Plan for these areas. If the Work Plan submitted by Respondents is inadequate, EPA may require Respondents to implement the Work Plan as modified by EPA. All table information may be submitted in "draft" form, boldly so marked, "for technical workgroup discussion purposes only," or any similar formulation.

Lastly, EPA has not yet received a map of human use areas (which was presented in a project meeting but not distributed). EPA presumes it is readily available for distribution. Similarly, EPA has not received the criteria and/or data used to select fish species for human health sampling, information on home ranges, or revised Data Quality Objectives (DQOs), all of which were required on or before April 15, 2002, as articulated in EPA's March 22, 2002 comment letter. EPA expects immediate transmission all of the items in this paragraph upon receipt of this letter.


Use of AOC Language and References in All Project Documents and Correspondence

Please note that EPA has listed the documents for which an extension is being granted by referencing the AOC paragraph number requiring submission of the deliverable, as well as describing the deliverable in a manner consistent with the language in the AOC. Respondents' letter requesting an extension uses new terminology to describe the deliverables. In future correspondence, Respondents must use AOC terminology and paragraph references unless Respondents and EPA mutually agree to any changes in terminology or nomenclature.

Project Contacts

Please note several changes to the "cc" list. Two changes of particular note are as follows. Tara Karamas, Remedial Project Manager, was recently assigned to the Portland Harbor project. Tara will be working with Wallace and Chip on all matters pertaining to the Site. Please make sure to include Tara on all written or email correspondence that has in the past been directed to Wallace and/or Chip. Additionally, Sylvia Kawabata will be replacing Amber Wong as Wallace, Chip, and Tara's first-line supervisor; Sylvia is an experienced EPA manager and joins the Portland Harbor team effective May 5, 2002.

Sincerely,


Wallace A. Reid
Remedial Project Manager

cc: [Note: project roles are sometimes used to help clarify project structure for cc recipients.]

FEDERAL AGENCIES

Agency for Toxic Substances & Disease Registry

John Crellin, Senior Environmental Epidemiologist [one signed original & email]

Jill Dyken, Environmental Health Scientist ~ *email only*

Rose Jackson, Health Communications Specialist ~ *email only*

Karen Larson, Environmental Health Scientist ~ *email only*

Dean Seneca, Manager & Tribal Affairs Coordinator ~ *email only*

Department of the Interior

Preston Sleeper, Designated AOC Project Coordinator [one signed original & email]

Barry Stein, Attorney ~ *email only*

Environmental Protection Agency

Curt Black, Hydrogeologist ~ *email only*

Deborah Burgess, PRP Search Coordinator ~ *email only*

Dana Davoli, Human Risk Assessor ~ *email only*

Rene Fuentes, Hydrogeologist ~ *email only*

Alan Goodman, McCormick & Baxter Project Manager ~ *email only*

Joseph Goulet, Eco Risk Assessor ~ *email only*

Matt Gubitosa, GIS Analyst ~ *email only*

Alison Hiltner, Duwamish Project Manager & Peer Reviewer ~ *email only*

Chip Humphrey, Project Manager [one signed original & email]

Tara-Ann Karamas, Project Manager [one signed original & email]

Sylvia Kawabata, Unit Manager ~ *email only*

John Malek, USACE Liaison & Dredging Coordination ~ *email only*

Elizabeth McKenna, Attorney ~ *email only*

Marie McPeak, Tribal Coordinator for Yakama & Nez Perce ~ *email only*

Charles Ordine, Attorney ~ *email only*

Clarence Ortman, Tribal Coordinator for Oregon Tribes ~ *email only*

Wallace Reid, Project Manager [originator]

Ravi Sanga, Remedial Project Manager ~ *email only*

Grechen Schmidt, PRP Search Investigator ~ *email only*

Judy Smith, Public Involvement Coordinator ~ *email only*

Kyle Stannert, Superfund Records Center Contact [three signed originals]

Sally Thomas, Remedial Project Manager ~ *email only*

Amber Wong, Unit Manager ~ *email only*

Julie Wroble, Risk Assessor ~ *email only*

Fish & Wildlife Service

Ted Buerger, Environmental Contaminants Division Manager [one signed original & email]

Jeremy Buck, Fish & Wildlife Biologist ~ *email only*

Mike Szumski, Environmental Contaminants Specialist ~ *email only*

National Oceanic and Atmospheric Administration

Helen Hillman, Designated AOC Project Coordinator [one signed original & email]

Nick Iadanza, Fishery Biologist ~ *email only*

Craig O'Connor ~ *email only*

Katherine Pease, Attorney ~ *email only*

List of ccs for EPA letter dated April 25, 2002: pertains to September 28, 2001 Administrative Order On Consent (AOC) between EPA & nine potentially responsible parties to conduct Portland Harbor RI/FS.

cc: [Continued]

STATE AGENCIES

Oregon Department of Environmental Quality

Mike Anderson, Fate & Transport Specialist ~ *email only*
Eric Blischke, Designated AOC Project Coordinator [one signed original & email]
Kim Cox, Interagency Coordinator ~ *email only*
Tom Gainer, Engineer ~ *email only*
Kevin Parret, Project Manager ~ *email only*
Jennifer Peterson, Toxicologist (Ecological) ~ *email only*
Mike Poulson, Toxicologist (Human Health) ~ *email only*
Michael Rosen, Manager, Voluntary Cleanup & Portland Harbor ~ *email only*
Rod Struck, Hydrogeologist ~ *email only*
Jennifer Sutter, Project Manager ~ *email only*

Oregon Department of Fish and Wildlife

Rick Kepler, Designated AOC Project Coordinator [one signed original & email]

Oregon Department of Justice

Kurt Burkholder, Assistant Attorney General [one signed original & email]
Lynne Perry, Assistant Attorney General ~ *email only*
Stephanie Striffler, Special Counsel to the Attorney General ~ *email only*

Oregon Public Health Branch

Harvey Crowder, Manager ~ *email only*
Michael Heumann, Program Manager ~ *email only*
Ken Kauffman [one signed original & email]
Karen Southwick ~ *email only*

TRIBES

Columbia River Inter-Tribal Fish Commission (CRITFC)

Catriona Black, Assistant Manager, Watershed Department ~ *email only*
Julie Carter, Policy Analyst [one signed original & email]
Patti Howard, Water Quality Coordinator ~ *email only*
Charles Hudson, Public Information Manager ~ *email only*
Paul Lumley, Manager, Watershed Department ~ *email only*

Grand Ronde Community of Oregon, Confederated Tribes of the

Kathleen Feehan, Designated AOC Project Coordinator [one signed original & email]
Stephen Kelly, Attorney ~ *email only*
Valerie Lee, Tribal Consultant ~ *email only*
Perri McDaniel, Cultural Resource Specialist ~ *email only*
Brent Merrill, Editor, Tribal Newspaper ~ *email only*

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cc: [Continued]

TRIBES [Continued]

Nez Perce Tribe

Gwen Carter, Nez Perce Contact ~ *email only*

Rick Eichstaedt, Interim* AOC Project Coordinator [one signed original & email]

* Patti Howard is Designated AOC Project Coordinator but now works for CRITFC

Antonio Smith, Editor, Tribal Newspaper ~ *email only*

Siletz Indians, Confederated Tribes of the

Billy Barquin, Outside Counsel ~ *email only*

Tom Downey, Designated AOC Project Coordinator [one signed original & email]

Umatilla Indian Reservation, Confederated Tribes of the

Deb Croswell, Public Affairs Manager ~ *email only*

Audie Huber, Designated AOC Project Coordinator [one signed original & email]

Wil Phinney, Editor, Tribal Newspaper ~ *email only*

Warm Springs Reservation of Oregon, Confederated Tribes of the

Bobby Brunoe, Interim* AOC Project Coordinator [one signed original & email]

* Brad Nye is Designated AOC Project Coordinator but no longer works for Warm Springs

Sid Miller, Publisher, Tribal Newspaper ~ *email only*

Yakama Nation, Confederated Tribes and Bands of the

Lynn Hatcher, Designated AOC Project Coordinator [one signed original & email]

Johnson Meninick, Manager, Cultural Resources Program ~ *email only*

Paul Ward, Environmental Manager ~ *email only*

Ronnie Washines, Managing Editor, Tribal Newspaper ~ *email only*

Anne Watanabe, Tribal Consultant ~ *email only*

Tom Zeilman, Attorney ~ *email only*

AOC PRP REPRESENTATIVES

Atofina

Doug Loutzenhiser ~ *email only*

Larry Patterson, Treasurer, Lower Willamette Group ~ *email only*

Chevron

Ken Frank ~ *email only*

Jerry Sedgwick ~ *email only*

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cc: [Continued]

AOC PRP REPRESENTATIVES [Continued]

City of Portland

Rick Applegate, Environmental Services Manager ~ *email only*

Debbie Khoja ~ *email only*

Jim Middaugh ~ *email only*

Al Smith ~ *email only*

Mary Stephens, Policy Coordinator ~ *email only*

Gunderson

Craig Coffey ~ *email only*

Lower Willamette Group (consortium formed by AOC PRP signatories)

Barbara Smith, Community Involvement Coordinator ~ *email only*

Betsy Striplin, RI/FS Coordinator [one signed original & email]

Northwest Natural Gas

Robert Wyatt, Co-Chairman, Lower Willamette Group* [one signed original & email]

* Designated AOC Project Coordinator

Port of Portland

Elaine Albrich ~ *email only*

Trey Harbert, Co-Chairman, Lower Willamette Group* [one signed original & email]

* Designated AOC Project Coordinator

Time Oil Company

Kevin Murphy ~ *email only*

Tosco

Marty Cramer ~ *email only*

Elissa Warantz ~ *email only*

Union Pacific Railroad

Gary Honeyman ~ *email only*

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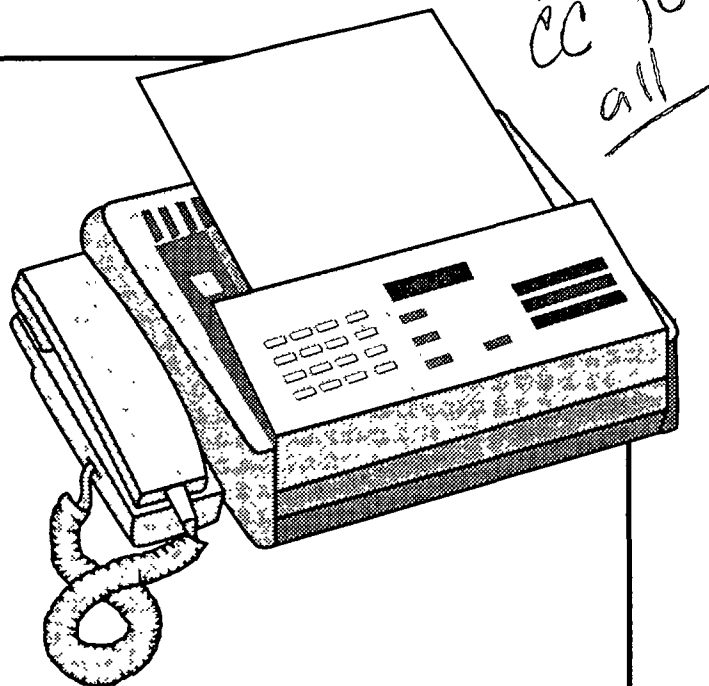
USEPA-10 Environmental Cleanup Office

(206) 553-1090

(206) 553-0124 Fax

(206) 553-0957 Fax

U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101-1128



Facsimile Cover Sheet

To: Robert Wyatt, Trey Harbert, Patricia Dost

From: Wallace Reid

Date: 4/25/2002

of Pages (including cover sheet): 8

Comments: _____

Approval letter for RI/FS Work Plan
submittal date.

Thanks. Pally.

Faxes/ Bob 503-273-4815

Trey 503-944-7353

Patricia 503-796-2900

TRANSACTION REPORT

P. 01

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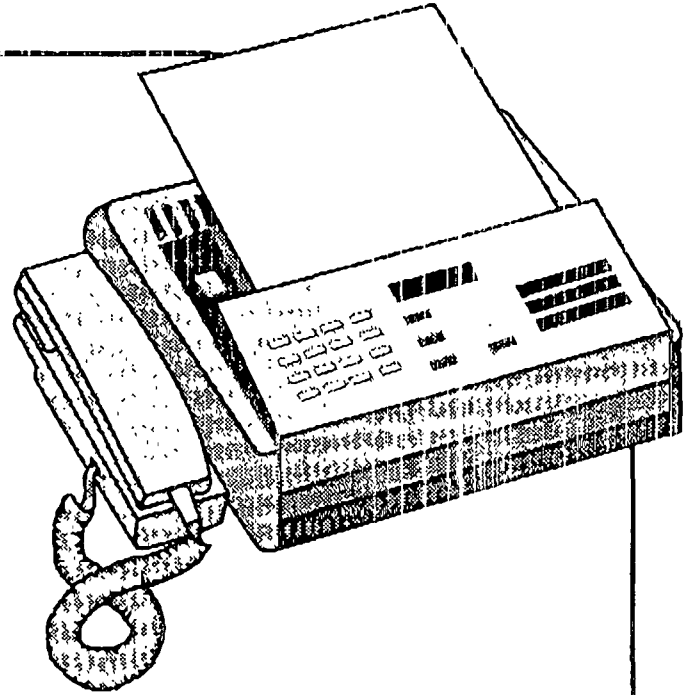
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Facsimile Cover Sheet

To: Robert Wyatt, Trey Harbert, Patricia Dost

From: Wallace Reid

TRANSACTION REPORT

P. 01

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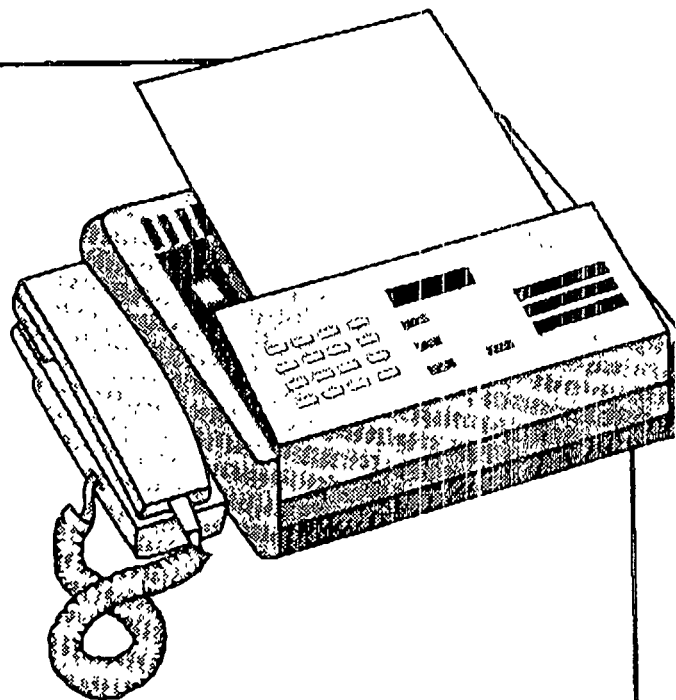
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To: Robert Wyatt, Trey Harbert, Patricia Dost

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P.01

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